

**THE HARMAN FIRM, PC**
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April 18, 2013

VIA FACSIMILE (212) 805-6326Hon. Colleen McMahon
United States District Court for the
Southern District of New York
500 Pearl Street, Room 1350
New York, New York 10007**Re: Allen v. UCP of NYC et al., 11 CV 8057 (CM)(KNF) (S.D.N.Y.)**

Dear Judge McMahon:

As you are aware, we represent Plaintiff Shameekia Allen in the above-referenced matter.

We are writing to respectfully request that the Court reconsider the exclusion of Plaintiff's Exhibit 60 (*Defendants' Response to Plaintiff's First Set of Interrogatories* dated May 30, 2012).

Plaintiff respectfully requests Your Honor's reconsideration especially in light of:

- (i) The inclusion of Plaintiff's responses to Defendants' interrogatories (Defendants' Exhibits 5 and 31); as well as
- (ii) The inclusion of Plaintiff's Exhibit 70, which, although does not exist (as Defendants did not supplement their May 30, 2012 response), was inadvertently included as *Defendants' Responses to Interrogatories*, and which were allowed with the caveat that "specifically identified portions may be admitted as party admission." See *Final Pre-Trial Order*, § VI at 23-24.

We thank the Court for its time and consideration.

Respectfully submitted,
THE HARMAN FIRM, PC

s/

Walker G. Harman, Jr. [WH-8044]

cc: Sean H. Close, Esq. (via email, sclose@putneylaw.com)
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I told you - the entire
thing does not come in.
Are there particular
interrogatories
you want in as
admissions?

Colleen McMahon
4/19/13

